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12 *Attorneys for Plaintiff*

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 NATIONAL CENTER FOR PUBLIC
16 POLICY RESEARCH,

17 Plaintiff,

18 v.

19 SHIRLEY N. WEBER, in her official
20 capacity as Secretary of State of the State of
21 California,

22 Defendant.

No. 2:21-cv-02168-JAM-AC

23 **STIPULATION RE EXTENSION**
24 **OF TIME FOR FILING**
25 **PLAINTIFF'S OPPOSITION TO**
26 **DEFENDANT'S MOTION TO**
27 **STAY THE PROCEEDINGS**
28

1 Plaintiff National Center for Public Policy Research and Defendant Shirley N.
2 Weber (Secretary), in her official capacity as Secretary of State of the State of
3 California through their respective counsel of record, hereby stipulate and agree as
4 follows:

5 WHEREAS, on March 7, 2022, the Secretary filed her motion to stay this case,
6 ECF No. 19;

7 WHEREAS, a new version of Local Rule 230 went into effect on March 1, 2022,
8 which changed the time for opposition briefs from 14 days before a hearing to 14 days
9 after the filing of the motion;

10 WHEREAS, the meet and confer for this motion happened on February 24,
11 2022, before the court ordered the adoption of the new rule on February 28, 2022;

12 WHEREAS, the calendaring software that Plaintiff's counsel uses had not been
13 updated to reflect this very recent change;

14 WHEREAS, Plaintiff is also currently briefing its opposition to Defendant's
15 Motion to Dismiss in this case and that motion follows the briefing schedule that
16 predates the adoption of the new Local Rule 230;

17 WHEREAS, the hearing date for the pending motion to stay and motion to
18 dismiss is scheduled for April 19, 2022 at 1:30 p.m;

19 WHEREAS, the parties have agreed that Plaintiff will file an opposition brief
20 by Friday March 25, 2022, and the Secretary's deadline for her reply brief will be April
21 4, 2022;

22 WHEREAS, the parties have agreed that these changes will have no bearing
23 on the briefing schedule for the pending motion to dismiss wherein Plaintiff's
24 opposition is due Tuesday, April 5, and the Secretary's reply is due on Tuesday, April
25 12, 2022.

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3 THEREFORE, it is hereby stipulated that:

- 4 1. Plaintiff's opposition to the Secretary's motion for a stay is due on Friday,
5 March 25, 2022.
6 2. The Secretary's reply brief in support of her motion for a stay is due on
7 Monday, April 4, 2022.
8

9 DATED: March 23, 2022.

10 By: /s Anastasia P. Boden
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*Attorneys for Plaintiff National Center for
Public Policy Research*

18 DATED: March 23, 2022.

19 ROB BONTA
20 Attorney General of California
21 LAURA L. FAER
22 VILMA PALMA-SOLANA
23 Supervising Deputy Attorneys General

22 By: /s Lisa Cisneros (as authorized)
23 LISA CISNEROS

24 Deputy Attorney General
25 *Attorney for Office of Secretary of State*
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3 HAVING CONSIDERED THE STIPULATION OF THE PARTIES, AND
4 GOOD CAUSE APPEARING, **IT IS SO ORDERED.**

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7 DATED: March 23, 2022

/s/ John A. Mendez

8 THE HONORABLE JOHN A. MENDEZ
9 UNITED STATES DISTRICT COURT JUDGE
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